

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

NGAMBULA WABIBI, Individually as)
Surviving Parent of FRANCIS WABIBI,)
Deceased, VEMBA WABIBI, Individually)
as Surviving Parent of FRANCIS WABIBI,)
Deceased, and SHANA WABIBI as)
Anticipated Administrator of the Estate of)
FRANCIS WABIBI, Deceased,)
Plaintiffs,)
CIVIL ACTION FILE NO.)
v.)
1:24-cv-05305-MLB)
FULTON COUNTY, GEORGIA, SHERIFF)
PATRICK LABAT, Individually,)
LIEUTENANT ANTONIO RICHARDSON,))
Individually, CAPTAIN JAMARL)
JOHNSON, Individually, and CADET)
DEPUTY ANTHONY OKONKWO,)
Individually,)
Defendants.)

**DEFENDANTS FULTON COUNTY, GEORGIA AND PATRICK LABAT’S
JOINT MOTION TO STAY DISCOVERY AND PRELIMINARY
DEADLINES**

Defendants Fulton County, Georgia and Patrick Labat (“Defendants”), through counsel, respectfully file this joint motion to stay discovery, including preliminary deadlines. In support thereof, Defendants rely on their Brief in Support being filed contemporaneously herewith.

Respectfully submitted, this 10th day of December, 2024.

Kaye Woodard Burwell
Georgia Bar No. 775060
Attorney for Defendants
Office of the Fulton County Attorney
141 Pryor Street, SW, Suite 4038
Atlanta, Georgia 30303
(404) 612-0251 (office)
Kaye.Burwell@fultoncountyga.gov

/s/ **Richard Caplan**
Richard Caplan
Georgia Bar No. 597634
Attorney for Defendants
Office of the Fulton County Attorney
141 Pryor Street, SW, Suite 4038
Atlanta, Georgia 30303
(404) 612-0246 (office)
Richard.Caplan@fultoncountyga.gov

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CERTIFICATE OF COMPLIANCE AND SERVICE

I hereby certify that the foregoing document has been prepared in accordance with the font type and margin requirements of Local Rule 5.1 of the Northern District of Georgia, using a font type of Times New Roman and a point size of 14. I further certify that I have this day electronically filed this **DEFENDANTS FULTON COUNTY, GEORGIA AND PATRICK LABAT'S JOINT MOTION TO STAY DISCOVERY AND PRELIMINARY DEADLINES** with the Clerk of

Court using the CM/ECF system, which will automatically send email notification to all attorneys of record.

Respectfully submitted, this 10th day of December 2024.

/s/ **Richard Caplan**

Richard Caplan

Georgia Bar No. 597634

Attorney for Defendants

Office of the Fulton County Attorney

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Atlanta, Georgia 30303

(404) 612-0246 (office)

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